

LAW OFFICES OF THOMAS MORE HOLLAND  
BY: THOMAS MORE HOLLAND  
IDENTIFICATION NO.: 43517  
1522 LOCUST STREET  
GRACE HALL  
PHILADELPHIA, PA 19102

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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JOSEPH MARINO	§	
Plaintiff,	§	
v.	§	
	§	
KENT LINE INTERNATIONAL	§	
d/b/a VOYAGEUR SHIPPING LTD., et al.	§	CIVIL ACTION NO: 02-CV-4489
Defendants.	§	
	§	

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*PLAINTIFF'S SUPPLEMENTAL ARGUMENT II IN OPPOSITION TO DEFENDANT'S KENT LINE  
MOTION FOR SUMMARY JUDGMENT*

Plaintiff, Joseph Marino, hereby respectfully submits the second Affidavit of his counsel as Exhibit "G" in Opposition to Defendant's Kent Line Motion for Summary Judgement.

It is respectfully submitted that this Affidavit and the attachments be considered as Exhibit "G" in opposition to Defendant Kent Line Motion for Summary Judgment.

Respectfully submitted,

DATE:

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THOMAS MORE HOLLAND  
Attorney for Plaintiff

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*IN THE UNITED STATES DISTRICT COURT  
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JOSEPH MARINO	§	
Plaintiff,	§	
v.	§	
	§	
KENT LINE INTERNATIONAL	§	
d/b/a VOYAGEUR SHIPPING LTD., et al.	§	CIVIL ACTION No.: 02-CV-4488
Defendants.	§	

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*AFFIDAVIT*

I, THOMAS MORE HOLLAND, am counsel to the Plaintiff in the above captioned matter.

I am over 18 years of age.

Appended hereto and made apart hereof is the four (4) page report from David E. Cole an expert witness and consultant in Admiralty and Maritime. Also enclosed is a one (1) page description of the materials reviewed.

In addition to the four (4) page report of April 20, 2003 from Mr. Cole a July 14, 2003 report is appended hereto along with Mr. Cole's three (3) resume of work experience.

These documents were furnished to Defendant's consistent within the Scheduling Order.

It is my belief and attestation that these attached documents accurately represent the experience and opinions of David E. Cole.

Respectfully Submitted,

DATE:

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THOMAS MORE HOLLAND  
Attorney for Plaintiff